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Attorneys for Defendants and Counter-Claimant
 COUNTY OF SANTA CLARA, KENNETH
 BORELLI, LAWRENCE GALLEGOS,
 EPIFANIO REYNA, and TANYA BEYERS

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 (SAN JOSE DIVISION)

UNITED STATES OF AMERICA,
 ex. rel. DONNA M McLEAN et al.,

Plaintiffs,

v.

THE COUNTY OF SANTA CLARA, a
 municipality et al.,

Defendants.

AND RELATED CROSS ACTION

No. C05-01962 HRL

**STIPULATION AND PROPOSED ORDER
 TO EXTEND DEADLINE FOR
 COMPLETING MEDIATION**

The parties submit the following Stipulation and Proposed Order for the purpose of
 requesting that the Court extend the deadline to complete mediation to July 30, 2008.

On March 18, 2008, counsel for Relator and Counter-Defendant Donna McLean,
 Defendants County of Santa Clara, Kenneth Borelli, Lawrence Gallegos, Epifanio ("J.R.")
 Reyna, and Tanya Beyers and Counter-Claimant County of Santa Clara, Sara Winslow from the
 United States Attorney's Office, and Julia Clayton from the California Attorney General's
 Office participated in a teleconference with Eric Ivary, the mediator appointed by the Court.
 During the teleconference the participants agreed to request that the present deadline to
 complete mediation, March 28, 2008, be extended. The reasons for the request for extension
 include the fact that Relator recently substituted counsel and filed a document under seal that

may impact the claims and/or defenses in this matter. Counsel for the United States and State of California represented that they intended to request that the Court lift the seal on the document within the next several weeks. Mr. Ivory and counsel for the Relator and Defendants agreed to participate in a mediation on July 22, 2008. Counsel for the United States and State of California indicated that they would not participate in the mediation.

Accordingly, the parties stipulate to extend the deadline to complete mediation to July 30, 2008.

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this efiled document.

ANN MILLER RAVEL
County Counsel

Dated: March 20, 2008

By: /S/
MELISSA R. KINIYALOCKS
Deputy County Counsel

Attorneys for Defendants and
Counter-Claimant
COUNTY OF SANTA CLARA,
KENNETH BORELLI, LAWRENCE
GALLEGOS, EPIFANIO REYNA, and
TANYA BEYERS

Dated: March 19, 2008

By: /S/
WILLIAM C. DRESSER

Attorney for Relator and
Counter-Defendant
DONNA McLEAN

ORDER EXTENDING DEADLINE TO COMPLETE MEDIATION

The Court, having considered the stipulation of the parties and finding good cause, hereby orders that the deadline to complete mediation in this matter is July 30, 2008. **The court is disinclined to extend this deadline any further.**

Dated: March 28, 2008


MAGISTRATE JUDGE HOWARD R. LLOYD